

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DOMINION CITRUS LIMITED, et al.	:	
	:	
Plaintiff,	:	C.A No. 07-00050 (JJF)
	:	
v.	:	
	:	
MV BADRINATH, et al.	:	
	:	
Defendant.	:	

**ANSWER OF DEFENDANTS SEATRADE REEFER CHARTERING NV, SEATRADE
GROUP NV, AND SEATRADE U.S.A., INC. TO CROSSCLAIMS OF ASHWATER
NAVIGATION CO., LTD.**

Defendants, Seatrade Reefer Chartering NV, Seatrade Group NV, and Seatrade U.S.A. (collectively, "Seatrade" or "Crossdefendants") answer the Crossclaim of Defendant/Crossclaimant Ashwater Navigation Co., Ltd. ("Ashwater" or "Crossclaimant") as follows:

1. Paragraph one of Ashwater's Crossclaim pertains to answers to the complaint and affirmative defenses that are not directed to Seatrade, and therefore no answer is required. If an answer is deemed necessary, then same is denied with strict proof thereof demanded at time of trial.

2. Denied as stated. Seatrade Group NV was at all times material hereto manager of the Seatrade Reefer Pool and in that capacity acted as disponent owner of vessels entered in the pool. Seatrade Reefer Chartering NV at all times material hereto acted as general agent for Seatrade Group NV. Seatrade U.S.A. at all times material hereto acted as local agent for Seatrade in the United States.

3. Paragraph 3 of Ashwater's Crossclaim calls for a conclusion of law to which no answer is required. If an answer is deemed necessary, then same is denied with strict proof thereof demanded at time of trial.

4. Paragraph 4 of Ashwater's Crossclaim calls for a conclusion of law to which no answer is required. If an answer is deemed necessary, then same is denied with strict proof thereof demanded at time of trial.

5. Paragraph 5 of Ashwater's Crossclaim calls for a conclusion of law to which no answer is required. If an answer is deemed necessary, then same is denied with strict proof thereof demanded at time of trial.

WHEREFORE, Crossdefendants pray:

1. That Plaintiffs' Complaint be dismissed with prejudice.
2. That judgment be granted in favor of Crossdefendants and against Crossclaimants.
3. That Crossdefendants be granted such other relief as may be deemed just and proper.

FOX ROTHSCHILD LLP

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*Attorneys for Defendants Seatrade Reefer
Chartering NV, Seatrade Group NV and
Seatrade U.S.A., Inc.*

Dated: June 27, 2007

CERTIFICATE OF SERVICE

I, Sharon Oras Morgan, Esquire, attorney for Defendants Seatrade Reefer Chartering NV, Seatrade Group NV, and Seatrade U.S.A., hereby certify that on June 27, 2007, two true and correct copies of the foregoing *Answer of Defendants Seatrade Reefer Chartering, N.V., Seatrade Group Inc. and Seatrade U.S.A., Inc. to the Crossclaims of Ashwater Navigation Co., Ltd.* , was served via First Class Mail upon the following:

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/s/ Sharon Oras Morgan
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